

1 LAURA VARTAIN (SBN: 258485)

2 laura.vartain@kirkland.com

3 **KIRKLAND & ELLIS LLP**

555 California Street, 30th Floor

San Francisco, CA 94104

Telephone: (415) 439-1625

5 ALLISON M. BROWN (*Pro Hac Vice* admitted)

allison.brown@kirkland.com

6 JESSICA DAVIDSON (*Pro Hac Vice* admitted)

jessica.davidson@kirkland.com

601 Lexington Avenue

New York, NY 10022

Telephone: (212) 446-4723

Counsel for Defendants

UBER TECHNOLOGIES, INC.,

RASIER, LLC, and RASIER-CA, LLC

[Additional Counsel Listed on Following Pages]

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **SAN FRANCISCO DIVISION**

17 IN RE: UBER TECHNOLOGIES, INC.,
18 PASSENGER SEXUAL ASSAULT
LITIGATION,

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING
SCHEDULE FOR DEFENDANTS'
MOTION TO DISMISS**

19 This Document Relates to:

20 *A.R. v. Uber Technologies, Inc., et al.*, No. 24-
21 cv-01827

22 *D.J. v. Uber Technologies, Inc., et al.*, No.
23 3:24-cv-07228

24 *A.G. v. Uber Technologies, Inc., et al.*, No.
3:24-cv-01915

25 *A.R. v. Uber Technologies, Inc., et al.*, No.
26 3:24-cv-07821

27 *B.L. v. Uber Technologies, Inc., et al.*, No. 24-
cv-7940

28 *C.L. v. Uber Technologies, Inc., et al.*, No.

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6 – 17th Floor

3:23-cv-04972

J.E. v. Uber Technologies, Inc., et al., No.
3:24-cv-03335

*Jane Doe QLF 0001 v. Uber Technologies,
Inc., et al.*, No. 3:24-cv-08783-CRB

Jaylynn Dean v. Uber Technologies, Inc., et al.,
No. 3:23-cv-06708

K.E. v. Uber Technologies, Inc., et al., No.
3:24-cv-05281-CRB

Amanda Lazio v. Uber Technologies, Inc., No.
3:24-cv-08937-CRB

LCHB128 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-7019

T.L. v. Uber Technologies, Inc., et al., No. 24-
cv-9217

WHB 318 v. Uber Technologies, Inc., No. 3:24-
cv-04889

WHB 407 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05028

WHB 823 v. Uber Technologies, Inc., No. 3:24-
cv-4900

WHB 1486 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04803

WHB 1876 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05230

WHB 1898 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05027

*Jane Roe CL 68 v. Uber Technologies Inc., et
al.*, No. 3:24-cv-06669-CRB

1 SABRINA H. STRONG (SBN: 200292)

2 sstrong@omm.com

3 JONATHAN SCHNELLER (SBN: 291288)

4 jschneller@omm.com

5 **O'MELVENY & MYERS LLP**

6 400 South Hope Street, 19th Floor

7 Los Angeles, CA 90071

8 Telephone: (213) 430-6000

9 Facsimile: (213) 430-6407

10 PATRICK L. OOT, JR. (*Pro Hac Vice* admitted)

11 oot@shb.com

12 **SHOOK, HARDY & BACON, LLP**

13 1800 K Street NW, 10th Floor

14 Washington, DC 20006

15 Telephone: (202) 783-8400

16 Facsimile: (202) 783-4211

17 ALYCIA A. DEGEN (SBN: 211350)

18 adegan@shb.com

19 MICHAEL B. SHORTNACY (SBN: 277035)

20 mshortnacy@shb.com

21 2121 Avenue of the Stars, Suite 1400

22 Los Angeles, CA 90067

23 Telephone: (424) 285-8330

24 Facsimile: (424) 204-9093

25 CHRISTOPHER V. COTTON (*Pro Hac Vice* admitted)

26 ccotton@shb.com

27 255 Grand Boulevard

28 Kansas City, MO 64108

Telephone: (816) 474-6550

Facsimile: (816) 421-5547

RECITALS

WHEREAS, on April 15, 2025, Defendants filed a motion to dismiss Plaintiffs' amended bellwether complaints, Dkt. 2791;

WHEREAS, on May 15, 2025, Plaintiffs filed an opposition to the motion to dismiss, Dkt. 3002;

WHEREAS, Defendants' reply in support of its motion to dismiss is presently due on June 2, 2025, pursuant to Pretrial Order No. 21, Dkt. 1950;

WHEREAS, Defendants' motion was noticed for a hearing date to be determined by the Court subsequently;

WHEREAS, Defendants seek, and Plaintiffs do not oppose, an additional 7 days to file their reply, extending the deadline to June 9, 2025;

WHEREAS, Defendants' request is based on the complexity of the legal issues presented, and other pressing matters in this and related litigation, including ongoing summary judgment briefing in the JCCP pending in the California Superior Court for San Francisco County; and

WHEREAS, no other dates in the pretrial schedule set out in Pretrial Order Nos. 21 and 26 would need to be changed to accommodate the requested extension;

STIPULATION

NOW, THEREFORE, the parties hereby agree and request the Court enter the parties' stipulation as follows:

Defendants' time to reply in support of their motion to dismiss the amended bellwether complaints (Dkt. 2791) is extended by 7 days, to and including June 9, 2025.

IT IS SO STIPULATED.

Dated: May 29, 2025

Respectfully submitted,

O'MELVENY AND MYERS LLP

By: /s/ Sabrina H. Strong
SABRINA H. STRONG (SBN: 200292)
sstrong@omm.com
JONATHAN SCHNELLER (SBN: 291288)
jschneller@omm.com

O'MELVENY & MYERS LLP
400 South Hope Street, 19th Floor

Los Angeles, CA 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407

Counsel for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

Respectfully submitted,

Dated: May 29, 2025

GIRARD SHARP LLP

By: /s/ Sarah R. London
Sarah R. London
GIRARD SHARP LLP
601 California St., Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
slondon@girardsharp.com

Rachel B. Abrams (SBN 209316)
PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
rabrams@peifferwolf.com

Roopal P. Luhana
CHAFFIN LUHANA LLP
600 Third Avenue, Floor 12
New York, NY 10016
Telephone: (888) 480-1123
luhana@chaffinluhana.com

Co-Lead Counsel for Plaintiffs
** Pursuant to Civ. L.R. 5-1(i)(3), the
electronic signatory has obtained approval
from this signatory.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. CHARLES R. BREYER
United States District Judge